



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

FJN/GK
F. #2018R01809

*271 Cadman Plaza East
Brooklyn, New York 11201*

January 7, 2022

By Email and ECF

Murray E. Singer, Esq.
14 Vanderventer Ave.
Suite 147
Port Washington, NY 11050

Re: United States v. Mustafa Goklu
Criminal Docket No. 19-386 (PKC)

Dear Mr. Singer:

At a status conference in this case on January 6, 2022, the government stated that it had not produced electronic scans of seized contents of physical items recovered from the defendant's residence and car on or about April 20, 2019. However, upon further review of its records, the government has confirmed that its prior statement was incorrect and it in fact provided these materials to prior defense counsel on or about July 7, 2021 (Bates-numbered MG000146 – MG000147). The government will provide you with additional copies of these materials via hard drive. All of the physical items referenced herein and in the government's prior discovery disclosures are available for your physical inspection at a mutually agreeable time upon request.

In addition, the government provides the following additional discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which supplements the government's disclosures made on or about September 19, 2019, December 10, 2020, January 19, 2021, and July 7, 2021. The government also requests reciprocal discovery from the defendant.

The enclosed supplemental discovery includes:

- Lists of devices recovered from the defendant's residence and car on or about April 20, 2019, Bates-numbered MG000148 – MG000151;
- GPS tracking data, Bates-numbered MG000152 – MG000153;
- Surveillance photos and videos dated August 28, 2018, Bates-numbered MG000154 – MG000165;

- Surveillance photos dated January 30, 2019, Bates-numbered MG000166 – MG000171;
- Materials from a bankruptcy proceeding involving the defendant, Bates-numbered MG000172 – MG000224;
- Localbitcoins.com account profile information, Bates-numbered MG000225 – MG000228;
- Currency receipts, Bates-numbered MG000229 – MG000235;
- Bittrex records, Bates-numbered MG000236;
- Coinbase records, Bates-numbered MG000237;
- Gemini records, Bates-numbered MG000238;
- Google records, Bates-numbered MG000239; and
- PayPal records, Bates-numbered MG000240.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

BREON PEACE
United States Attorney

/s/ Gillian A. Kassner
Gillian A. Kassner
Francisco J. Navarro
Assistant United States Attorneys
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Enclosures

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)